

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

MINNESOTA LIFE INSURANCE
COMPANY

Plaintiff,

-VS-

SHURWEST HOLDING COMPANY,
INC., an Arizona corporation; and
SHURWEST, LLC, an Arizona limited
liability company, THE QUANTUM
GROUP USA, LLC, an Arizona
limited liability company, and Ron
Shurts, an individual.

Defendants.

Case No.: 0:21-cv-01603-JNE-
ECW

**STIPULATION TO MODIFY
BRIEFING SCHEDULE FOR
MOTIONS TO DISMISS
FILED BY THE QUANTUM
GROUP USA, LLC, AND RON
SHURTS**

WHEREAS, on July 12, 2021, Minnesota Life filed its initial Complaint in this action;

WHEREAS counsel for Mr. Shurts (“Shurts”) and The Quantum Group USA, LLC (“Quantum”) waived service and their responses to the initial Complaint were due on November 22, 2021;

WHEREAS Minnesota Life granted Shurts and Quantum an extension to respond to the initial Complaint to December 2, 2021, and their motions to dismiss were filed on that date;

WHEREAS on December 6, 2021, this Court issued an order requiring Minnesota Life to clarify Quantum's residence, and Minnesota Life filed its Amended Complaint on December 13, 2021;

WHEREAS Quantum and Shurts filed their motions to dismiss the Amended Complaint on December 23, 2021;

WHEREAS, due to the intervening Christmas and New Year holidays, the parties have agreed to extend the deadline for Minnesota Life to oppose Quantum and Shurts' motions to dismiss to February 3, 2022;

WHEREAS, the parties further agree to continue Quantum and Shurts' deadline to file any reply to February 18, 2022.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Minnesota Life and Quantum and Shurts, by and through their respective undersigned counsel, that:

1. Minnesota Life's time to oppose the motions to dismiss filed by Quantum and Shurts is extended to February 3, 2022.
2. Quantum and Shurts' deadline to file a reply in support of their motions is extended to February 18, 2022.

Dated: January 11, 2022

s/Shawn M. Raiter

Shawn M. Raiter (#240424)

David M. Wilk (#222860)

LARSON • KING, LLP

2800 Wells Fargo Place

30 East Seventh Street

St. Paul, MN 55101

Tel: (651) 312-6500

sraiter@larsonking.com

dwilk@larsonking.com

Robert D. Phillips, Jr. (*pro hac vice*
forthcoming)

Kathy J. Huang (*pro hac vice*
forthcoming)

Gillian H. Clow (*pro hac vice*
forthcoming)

ALSTON & BIRD, LLP

333 South Hope St, 16th FL

Los Angeles, CA 90071

Tel: (213) 576-1000

bo.phillips@alston.com

kathy.huang@alston.com

gillian.clow@alston.com

***Attorneys for Plaintiff Minnesota
Life Insurance Company***

Date: January 10, 2022

By: s/ J. Neil Stuart

Daniel G. Dowd (*pro hac vice*)

J. Neil Stuart (*pro hac vice*)

Cole K. Kubosumi (*pro hac vice*)

COHEN DOWD QUIGLEY P.C.

The Camelback Esplanade I

2425 East Camelback Road, Suite 1100

Phoenix, Arizona 85016

Tel: (602) 252-8400

ddowd@cdqlaw.com

nstuart@cdqlaw.com

ckubosumi@cdqlaw.com

Lindsey A. Davis (#0332148)

Mackenzie Moy (#0397013)

ZELLE LLP

500 Washington Avenue South, Suite 4000

Minneapolis, MN 55415

Tel: (612) 339-2020

ldavis@zelle.com

mmoy@zelle.com

***Attorneys for Defendants The Quantum Group
USA, LLC and Ronald L. Shurts***